



## MEMO ENDORSED

Oliver E. Twaddell | Partner  
Direct 646.292.8751 | otwaddell@goldbergsegalla.com

April 20, 2020

**VIA ECF**

The Hon. Edgardo Ramos  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Scottsdale Insurance Company v. Razzal Hospitality and Management, Inc., et al.***

**Civil Action No.: 1:19-cv-02436-ER**

**Re: Application for Extension of Time and Notice of Impending  
Substitution of Counsel**

Dear Judge Ramos:

We represent defendant 2242 Realty LLC ("2242 Realty") in this case. We are writing for two reasons: (1) to alert the Court that our firm will be imminently substituting out as counsel, and new counsel will be entering an appearance shortly; and (2) to request a brief adjournment of two weeks of the telephone conference regarding Plaintiff's Order to Show Cause for Default Judgment scheduled for this Wednesday, April 22, 2020 at 10:30 AM. We believe that this short extension will be sufficient time to accomplish the substitution. At this time, 2242 Realty cannot agree to the proposed order. There have been no other requests for an extension, no written discovery has been exchanged, and no depositions have been scheduled.

We thank the Court for its consideration.

The Court is in receipt of 2242 Realty's most recent letter, indicating the plaintiff's consent to its application. Doc. 72. The Court notes this conference was scheduled on March 12, Doc. 69, and service was made on LCG Community Services via mail on March 18, Doc. 70.

The application is DENIED. Counsel for 2242 Realty is directed to appear at tomorrow's telephonic conference. If counsel is unable to appear, 2242 Realty is directed to submit a letter by 6:00 p.m. today showing good cause for counsel's failure to appear and detailing 2242 Realty's objections to the proposed default judgment against LCG Community Services.

A handwritten signature in blue ink, appearing to read 'Edgardo Ramos'.

Edgardo Ramos, U.S.D.J

Dated: Apr. 21, 2020

New York, New York

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